

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

---

ANNA BALOGH,

Plaintiff,

v.

HILLARY CLINTON, in her official  
capacity as Secretary of State for the  
United States of America,

Defendant.

---

C.A. NO. 07-11086-RBC

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Hillary Clinton, in her official capacity as Secretary of State for the United States of America (the “defendant”), by and through her attorney, Michael K. Loucks, Acting United States Attorney for the District of Massachusetts, herein moves this Court to grant her Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56(b) and (c). For the reasons set forth in the defendant’s attached Memorandum of Law with supporting exhibits and Local Rule 56.1 Statement of Facts, the undisputed material facts show that the defendant is entitled to judgment in her favor.

WHEREFORE, based on the arguments and authorities stated in this Motion and attached Memorandum of Law with Supporting Exhibits and Local Rule 56.1 Statement of Facts, the defendant moves this Court to grant her Motion for Summary Judgment.

Respectfully, submitted,

HILLARY RODHAM CLINTON,  
In her capacity as Secretary of State  
of the United States of America

Respectfully submitted,

MICHAEL K. LOUCKS  
ACTING UNITED STATES ATTORNEY

By: /s/ Rayford Farquhar  
Rayford Farquhar  
Assistant US Attorney  
U.S. Attorney's Office  
1 Courthouse Way, Suite 9200  
Boston, MA 02110  
617-748-3284

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on October 28, 2009.

/s/ Rayford Farquhar  
Rayford Farquhar  
Assistant US Attorney